

**REMARKS**

Reconsideration of this application is requested.

Claims 12 and 14 have been amended to emphasize novel and patentable aspects of the applicants' invention. In particular, claim 12 has been amended to indicate that the extensions on the bottom plate function, when contacted by golf balls on the lawn being mowed, to raise the cutting attachment via the suspension system so that the balls pass under the bottom plate outside the reach of the blades while the blades continue to mow. Basis for this feature of the invention is found in, for example, Figs. 3b and 3c and the related description. There is nothing in the Examiner's references to suggest this aspect of the applicant's invention in the context of a robotic lawn mower. It is to be emphasized that the arrangement of the applicant's invention goes farther than simply "keeping golf balls away from the cutting disk" as the Examiner suggests. In fact, as mentioned in applicant's claim 12, the balls are allowed to pass under the bottom plate and thereby lift the cutting arrangement. This is an important distinguishing feature with respect to Elia's arrangement. Elia's bottom disk is not able by itself to lift the cutter disk versus the chassis. In fact, the Elia device, being handheld, depends on the user to lift the device if the guard contacts an obstacle.

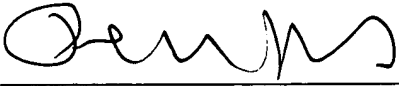
The amendment to claim 14 specifies that the outer ends of the extensions of the bottom plate are upwards curved. This feature is not disclosed or suggested by the Examiner's references. Basis for this amendment is found in the applicant's disclosure at page 6, lines 3-4 and in original claim 8.

It is respectfully submitted that the applicant's invention, particularly as defined in the now-amended claims, is not in any sense obvious from the applicant's earlier patent (Colens 6,321,515) even if considered with the Elia disclosure (EP 324322). For example, the guard plate used by Elia does not function to raise the cutter disk in the manner specified by the applicant. Similarly, Elia's guard does not include upwardly curved ends nor is this feature suggested by Elia. Hence, even if the references are considered together, the applicant's invention as called for in the amended claims is thought to be patentably distinguished from the Examiner's references.

Favorable reconsideration, with allowance, is requested.

Respectfully submitted,

MORGAN LEWIS & BOCKIUS LLP

By   
Paul N. Kokulis  
Reg. No. 16773

Date: October 17, 2005

**Customer No. 09629**  
1111 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Phone: (202) 739-3000  
Facsimile: (202) 739-3001  
Direct: (202) 739-5455